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May 06, 2020

Via ECF

Hon. Barbara Moses, U.S.M.J United States District Court Southern District of New York 500 Pearl Street New York, NY 10007-1312

MEMO ENDORSED

Re: Plaintiff's Letter Requesting for Extension of Time to Submit Pre-Conference Statement

1:19-cv-07332-PAE-BCM Ke v. J R Sushi 2 Inc et al

Your Honor,

This office represents the Plaintiff's in the above-referenced matter. We write respectfully to request extension of time until May 07, 2020, to file joint pre- conference statement which is currently due on May 6, 2020. The requested extension will not effect any other deadlines.

On April 15, 2020, Your Honor scheduled Initial case management conference for May 13, 2020 at 11:00 a.m and Ordered parties to jointly submit a pre-conference statement by May 06, 2020. Accordingly, on May 04, 2020, Plaintiff's sent his pre-conference statement to both Defense Counsel, Benjamin B. Xue and Yi Lin. Upon, following up today Defense Counsel Mr. Xue promptly responded with revised pre-conference statement. However, as of filing of this letter, Plaintiff's counsel has still not received any response from Defense counsel Mr. Lin. The undersigned office emailed and called the defense counsel, but no one has responded to the email nor the call. As such, Plaintiffs would like to wait until tomorrow May 07, 2020, before filing Plaintiff's and Defense Counsel Mr. Xue's Pre-Conference Statement.

For the foregoing reasons, Plaintiff requests to extend time until May 07, 2020 to submit the pre-conference statement should be granted.

We thank the court for its continued attention to this matter.

Respectfully submitted, TROY LAW, PLLC

s / John Troy Attorney for Plaintiff

cc: Via ECF All Counsel of Record

JT/sm

Application GRANTED. SO ORDERED.

Barbara Moses, U.S.M.J.

May 7, 2020